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13 *Everest National Insurance Company*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 JUDSON MAC DUFF,

17 Case No.: 2:23-cv-00174-JCM-VCF

18 Plaintiff,

19 vs.

20 EVEREST NATIONAL INSURANCE d/b/a  
21 EVEREST INSURANCE COMPANY, a foreign  
22 corporation; DOE EVEREST NATIONAL  
23 INSURANCE d/b/a EVEREST INSURANCE  
24 COMPANY EMPLOYEE, an individual; DO  
25 INDIVIDUALS I-X, inclusive; and ROE  
26 CORPORATIONS I-X, inclusive,

27 Defendants.

28 **STIPULATION AND ORDER TO  
EXTEND TIME FOR INITIAL  
RESPONSE TO COMPLAINT**

(FIRST REQUEST)

29 Plaintiff Judson MacDuff (“Plaintiff”) and Defendant Everest National Insurance Company  
30 (“Everest”) jointly stipulate that Everest’s time to respond to Plaintiff’s Complaint is extended thirty  
31 (30) days from the current date of February 8, 2023, until **March 10, 2023**. The request is to allow  
32 Everest to review the factual basis of Plaintiff’s claim, including recent and additional documentation  
33 related to Plaintiff’s claimed damages, which review will allow the parties a more thorough  
34 opportunity to address the issues in dispute related to Plaintiff’s claim for insurance benefits. This is  
35 the first extension of time of Everest’s deadline to respond to the Complaint.

1           The parties hereto preserve and do not waive any objections or defenses by this Stipulation.

2           **IT IS SO STIPULATED, this 6th day of February, 2023.**

3           /s/ Howard J. Russell

4           Howard J. Russell, Esq.

5           Sebastian Cribari, Esq.

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11          *Everest National Insurance Company*

12          /s/ Jessica M. Munoz

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14          RICHARD HARRIS LAW FIRM

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16          Las Vegas, NV 89101

17          *Attorneys for Plaintiff Judson Mac Duff*

18           IT IS SO ORDERED.



19          Cam Ferenbach

20          United States Magistrate Judge

21          2-6-2023

22          DATED \_\_\_\_\_